

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

CHARLIE JAVICE and OLIVIER AMAR,

Defendants.

Case No.: 1:23-cr-00251-AKH

**DEFENDANT CHARLIE JAVICE'S NOTICE OF MOTIONS IN LIMINE
AND MEMORANDA OF LAW IN SUPPORT**

Pursuant to the Court's Order Regulating Proceedings [ECF No. 163], Defendant Charlie Javice hereby makes the following *in limine* motions¹:

1. Evidence and argument comparing Ms. Javice to well-known, convicted fraudsters should be excluded;
2. The government's exhibits with no path to admissibility should be excluded pretrial;
3. Evidence related to Westside Advisors' Declined Investment in Frank should be excluded;
4. The Court should enter sequestration and nondisclosure orders covering non-party witnesses and their representatives pursuant to Federal Rule of Evidence 615;
5. The Court should not allow the government to call Matthew Glazer to testify.

¹ To facilitate the Court's resolution of these matters, Ms. Javice will cause to be delivered to Chambers a copy of each exhibit referenced herein, labeled by exhibit number. Voluminous and media exhibits can be made available upon request of the Court.

Respectfully submitted,

DATED: January 13, 2024

**QUINN EMANUEL URQUHART
& SULLIVAN, LLP**

By: /s/ Sara Clark

Sara Clark (*pro hac vice*)
700 Louisiana Street, Suite 3900
Houston, TX 77002
Telephone: (713) 221-7100
saraclark@quinnemanuel.com

Erica Perdomo (*pro hac vice*)
2601 South Bayshore Drive, Suite 1550
Miami, FL 33133
Telephone: (305) 402-4880
ericaperdomo@quinnemanuel.com

**MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY & POPEO, P.C.**

David Siegal
Ellen Shapiro
919 Third Avenue
Telephone: (212) 935-3000
dmsiegal@mintz.com
eshapiro@mintz.com

Eóin P. Beirne (*pro hac vice*)
Boston, MA 02111
Telephone: (617) 542-6000
epbeirne@mintz.com

BAEZ LAW FIRM

Jose Baez (*pro hac vice*)
Rosemarie E.W. Peoples (*pro hac vice*)
1200 Brickell Avenue
Miami, FL 33131
Telephone: (305)-999-5100
jose@baezlawfirm.com
rosemarie@baezlawfirm.com

RONALD SULLIVAN PLLC

Ronald Sullivan (*pro hac vice*)
1300 I Street NW, Suite 400E
Washington, DC 20005
Telephone: (202) 313-8313
rsullivan@ronaldsullivanlaw.com

Counsel for Defendant Charlie Javice

CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2025, I caused a copy of the foregoing document to be served via ECF on counsel of record.

By: /s/ Sara C. Clark